

**IN THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF TEXAS
MARSHALL DIVISION**

NICHIA CORPORATION,

Plaintiff,

v.

VIZIO, INC.

Defendant.

**C.A. No. 2:16-cv-01453-JRG
(Lead Case)**

JURY TRIAL DEMANDED

DEFENDANTS' RESPONSIVE CLAIM CONSTRUCTION BRIEF

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Defendants Lowe’s Home Centers, LLC and L G Sourcing, Inc. (collectively, “Lowe’s”); Feit Electric Company, Inc. (“Feit Electric”); and VIZIO, Inc. (“VIZIO”) (all entities collectively, “Defendants”) respectfully submit this Responsive Claim Construction Brief pursuant to P.R. 4-5(b).¹

I. BACKGROUND OF THE TECHNOLOGY

The asserted patents pertain generally to a light emitting diode (“LED”) package and to a method for manufacturing the same. ’250 patent at 1:17-21. An LED package is a semiconductor-based component that provides internal circuitry for an LED lighting product. An LED package consists of a light emitting element which is mounted on a lead frame made of metal, light reflecting material, and a housing made of thermosetting resin. ’250 patent at 1:17-21. Light emitting elements (and hence LEDs) are a type of semiconductor that can be used to generate light. *Id.* at 1:27-29. The light emitting element is mounted on the metal frame. The lead frame is notched to provide open areas in which the metal frame has been removed. Thermosetting resin is applied to the package so as to fill in the openings, or notches in the lead frame, without leaving any gaps. *Id.* at 3:8-12.

Once the resin is molded to the lead frame, individual LED packages are then cut out, or “singulated.” *Id.* at 5:15-17, 6:32-38. The resin-molded body is cut out along a notch, which reduces the amount of the metal lead frame that has to be cut. *Id.* at 3:32-35, 6:26-31. As a result of singulation by cutting along the notch, the outside surface of the package is a single plane with both resin and exposed metal leads. *Id.* at 2:63-3:1. This allows the simultaneous manufacture of multiple light emitting devices while maintaining a high adhesion between the lead frame and the resin. *Id.* at 2:49-53.

¹ Defendants continue to maintain their respective objections that venue in the U.S. District Court for the Eastern District of Texas is improper under 28 U.S.C. § 1400(b) and reserve their positions with respect to all defenses they have asserted in pending motions.

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